



**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

June 2, 2016

Via Electronic Filing

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

In the Matter of	)	
	)	
Terrestrial Use of the 2473-2495 MHz Band	)	
for Low-Power Mobile Broadband Networks;	)	IB Docket No. 13-213
Amendments to Rules for the Ancillary	)	
Terrestrial Component of Mobile Satellite	)	
Service Systems	)	

Dear Ms. Dortch,

The Bluetooth SIG and its 30,000 Member companies are very disappointed to hear that despite considerable industry opinion to the contrary and without appropriate testing being conducted, the FCC is considering approval of the TLPS proposal from Globalstar.

The Bluetooth SIG maintains that if the TLPS proposal is approved, it would be the wrong decision for the industry and set a dangerous precedent by allowing one company to have a different set of rules for operation in the ISM band than the thousands of companies already following the existing rules and expending considerable time, effort and money in order to comply with those rules.

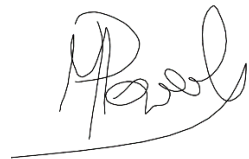
The Bluetooth SIG also maintains that TLPS will cause destructive interference to many millions of Bluetooth devices, particularly those using the latest Bluetooth Low Energy technology. Devices which today provide real health and quality of life benefit to US consumers, including life sensitive applications such as insulin pumps and heart rate

monitors as well as the latest hearing aids. In fact the TLPS technical demonstrations conducted at the FCC showed that there was more than enough cause for concern of potential destructive interference, an opinion echoed by a majority of other filings in the record for this matter.

The Bluetooth SIG believes that it does not make any sense to approve a proposal that would negatively impact the valuable role that the existing ISM band technologies play in the US market. Technologies that are essential to keep US consumers connected in the 21st century. Technologies that are the primary catalysts for wireless connectivity innovation by US entrepreneurs in the Internet of Things. Technologies that in the US have generated a total economic value of > 200 billion (in 2013) and have contributed \$6.7 billion to the nation's GDP.

For these reasons the Bluetooth SIG would like to urge the FCC to deny the TLPS proposal.

Respectfully submitted,



**On behalf of the Bluetooth SIG,**

**Mark Powell**  
**Executive Director**  
**Bluetooth SIG, Inc.**  
**425.691.3530**  
[mpowell@bluetooth.com](mailto:mpowell@bluetooth.com)